

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION**

**JILL DILLARD, JESSA SEEWALD,  
JINGER VUOLO, and JOY DUGGAR**

**PLAINTIFFS**

**vs.**

**CASE NO. 5:17-5089-TLB**

**CITY OF SPRINGDALE, ARKANSAS;  
WASHINGTON COUNTY, ARKANSAS;  
KATHY O'KELLEY, in her individual and  
official capacities;  
ERNEST CATE, in his individual and official capacities;  
RICK HOYT, in his individual and official capacities;  
STEVE ZEGA, in his official capacity;  
And DOES 1-10, inclusive**

**DEFENDANTS**

**AFFIDAVIT OF THE CITY DEFENDANTS' COUNSEL OF RECORD**

On this 25<sup>th</sup> day of October 2021, the Separate City Defendant's attorney of record makes the following truthful statement.

1. My name is Morgan S. Doughty and an attorney of record for the City Defendants.
2. Pursuant to the Order to Show Cause (the "Order") entered on August 20<sup>th</sup>, 2021 (Doc. 128), I completed the following:
  - a. Mailed a copy of the Order, certified with return-receipt requested, to Mr. Gallagher at all known mailing addresses, which are listed below, within two (2) business days of the entry of the Order:
    - i. 523 South Louisiana, Suite 222, Little Rock, Arkansas 727201.
    - ii. 307 W. Stilwell Avenue, Dequeen, Arkansas 71832
  - b. The green card indicating Mr. Gallagher's receipt of the Order is attached as Exhibit "A" to this Affidavit.

c. I emailed a copy of the Order to Mr. Gallagher at the following email address,  
a copy of which is attached as Exhibit "B" to this Affidavit.

i. info@legacymail.org

3. This affidavit details my compliance with the Order.

This concludes my Affidavit.

  
Morgan S. Doughty

On this 25<sup>th</sup> day of October, 2021, before me, the undersigned Notary Public, personally appeared Morgan Doughty, known to me to be the person whose name is the purposes therein contained.

IN WITNESS WHEREOF I hereunto set my hand and official seal

  
Notary Public

8/29/28  
Commission Expires

